

November 22, 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

By: DT **Deputy**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARISA BEATRIZ MORENO,
Defendant.

THE GRAND JURY CHARGES.

INTRODUCTION

At all times relevant to this Indictment:

1. Prior to March 9, 2020, the U.S. Munitions List (USML), located at Title 22, Code of Federal Regulations, Section 121.1, detailed articles, services and related technical data designated as defense articles or defense services pursuant to sections 38 and 47(7) of the Arms Export and Control Act.
 2. Ammunition was designated as a defense article under Category III(a) of the USML.
 3. According to Title 22, United States Code, Section 2778, no ammunition may be exported out of or imported into the United States without a license for such export or import.
 4. At all times relevant, Defendant Marisa Beatriz Moreno did not have a license or any authority to export ammunition from the United States to Mexico.

COUNT ONE
(18 U.S.C. §§ 371, 554)

The Introduction of this Indictment is hereby incorporated by reference as if fully set forth
herein.

Beginning on or about December 26, 2019, and continuing to and including on or about February 12, 2020, in the Western District of Texas, Defendant,

MARISA BEATRIZ MORENO,

and others known and unknown to the grand jury, knowingly and willfully did combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury, to commit the following offense against the United States, that is, knowingly and unlawfully conceal, buy, and facilitate the transportation and concealment of any merchandise, article and object, prior to exportation, knowing the same to be intended for exportation from the United States, contrary to any law or regulation of the United States, to-wit: approximately 50,000 rounds of 7.62 x 39mm rifle ammunition, all in violation of Title 18, United States Code, Sections 371 and 554.

OVERT ACTS

1. Defendant on or about February 12, 2020 purchased approximately 8,320 rounds of 7.62 x 39mm rifle ammunition at the direction of another person with the intent to export it from the United States.

2. On February 12, 2020, Defendant made a false declaration to a Customs and Border Protection Officer about the presence of ammunition in the car she was driving that day as she attempted to exit the United States and enter Mexico with the ammunition.

COUNT II
(18 U.S.C. § 554)

That on or about February 12, 2020, in the Western District of Texas and elsewhere, Defendant,

MARISA BEATRIZ MORENO,

knowingly and unlawfully exported and attempted to export from the United States into Mexico, any merchandise, article and object, contrary to any law or regulation of the United States, to wit:

approximately 8,320 rounds of 7.62 x 39mm rifle ammunition, in violation of Title 18, United States Code, Section 554.

A TRUE BILL.

[REDACTED] _____
FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY: 
Assistant U.S. Attorney